

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

Case No. 22-mj-358 JFD

CALVIN MARNEZE LEREON WRIGHT

**AFFIDAVIT OF MATTHEW CUTCHER**

I, Matthew Cutcher, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. Your affiant is employed as a Special Agent with the United States Department of Justice, Drug Enforcement Administration (DEA), and has been employed in this capacity since January of 2004. I am currently assigned to the Minneapolis/St. Paul District Office (MSPDO) with the Tactical Diversion Squad. Prior to that, I was employed as a police officer for approximately 5 years in Florida.

2. During my employment with DEA and prior law enforcement, I have had formal training and experience in controlled substance investigations, and I am familiar with the manner in which controlled substances, including fentanyl, marijuana, cocaine, methamphetamine, and other controlled substances, are packaged, distributed, and consumed. I have received training in the identification of controlled substances, including fentanyl, marijuana, cocaine, methamphetamine, and other controlled substances. I have participated in executing numerous arrests and search warrants for violations involving such substances. In the course of my employment, I have become familiar with the ordinary meaning of controlled substance slang and jargon, and I am familiar with the manners and

techniques of traffickers who distribute controlled substances. I have also received training from experienced DEA Special Agents and other narcotics officers in the investigation of major drug traffickers.

3. This Affidavit is in support of a criminal complaint charging Calvin Marneze Lereon WRIGHT with aiding and abetting the possession with intent to distribute fentanyl in violation of Title 18 U.S.C. § 2 and Title 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A).

4. The facts and information contained in this Affidavit are based upon my own investigation, as well as observations of other agents and law enforcement officers. This Affidavit contains information necessary to support probable cause for the attached Complaint. It is not intended to include each and every fact and matter known to me or known to the government.

#### **PROBABLE CAUSE**

5. During April 2022, law enforcement intercepted a package containing approximately 30,000 blue pills with an "M30" stamp on them. These pills are made to resemble prescription Oxycodone pills. However, based on training, experience, and prior investigations, your affiant knows that these pills are counterfeit and believes that they actually contain fentanyl. These pills are currently pending testing at the DEA laboratory. This package was delivered to an address in Minnesota from a source in Arizona. Certain telephone numbers were tracking the delivery of this package.

6. On April 25, 2022, law enforcement learned that this source in Arizona was shipping another package to "Calvin Smith" at 15336 Founders Lane in Apple Valley,

Minnesota. Law enforcement believed that this package may contain a similar amount of fentanyl pills. The package was scheduled to be delivered on April 26, 2022.

7. During the morning of April 26, 2022, members from the DEA, Dakota County Drug Task Force and the Bureau of Alcohol, Tobacco and Firearms conducted visual surveillance at 15336 Founders Lane, Apple Valley, MN. This address is a townhome and the residence of Calvin Marneze Lereon WRIGHT.

8. Agents observed a United States Postal employee arrive in the townhome community in Apple Valley, MN at approximately 8:45 AM. The postal employee walked in the direction of 15336 Founders Lane, Apple Valley, MN and shortly thereafter returned to the postal vehicle and left the location. The United States Postal Inspectors Office confirmed the delivery of a parcel to 15336 Founders Lane, Apple Valley, MN 55124.

9. Approximately one hour later, agents observed a 2019 White colored VW Jetta, bearing Minnesota License Plate 01144569 exit the garage belonging to 15336 Founders Lane, Apple Valley, MN. This vehicle is registered to Calvin Marneze Lereon WRIGHT.

10. Agents conducted moving surveillance on the 2019 Jetta which began travelling west on West 160<sup>th</sup> Street, heading towards Cedar Avenue, Apple Valley, MN. The Jetta was stopped at a red light signal in the through lane at the intersection of West 160<sup>th</sup> Street and Cedar Avenue. As a marked Apple Valley Police Vehicle being operated by Officer Dylan Ordorff approached the rear of the 2019 Jetta, the Jetta made an illegal right hand turn from a through lane. Officer Ordorff activated his emergency lights and conducted a traffic stop on the Jetta at the corner of Cedar Avenue and West 160<sup>th</sup> Street.


11. Officer Ordorff approached the driver's side of the Jetta and made contact with the driver, WRIGHT. Officer Ordorff smelled a strong odor of marijuana emanating from inside the vehicle. Officer Ordorff requested the assistance of a K-9 Officer to conduct an exterior sniff with his K-9, which resulted in a positive alert. A roadside search was conducted on the 2019 Jetta. During the search, Officer Ordorff located a bag inside the trunk of the 2019 Jetta. Inside this bag contained several heat-sealed bags containing approximately 2.1 kilograms of blue colored pills with the "M30" stamp logo imprinted on them. Due to Officer Ordorff's training and experience, Officer Ordorff recognized these pills as fraudulent Oxycodone pills laced with fentanyl. Officer Ordorff placed WRIGHT under arrest for possession of a controlled substance.

12. Your affiant is familiar with these blue pills with the M30 stamp. Given the quantity of the pills, their source from Arizona, past investigations, and training and experience, your affiant knows that these pills are commonly counterfeit prescription pills and actually contain fentanyl.




13. Based on the above stated facts, your Affiant believes probable cause exists that Calvin Marneze Lercon WRIGHT, while aiding and abetting others, possessed fentanyl with the intent to distribute it in violation of Title 18 U.S.C. § 2 and Title 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A).

Further your Affiant sayeth naught.

  
Matthew Cutcher, Special Agent  
Drug Enforcement Administration

SUBSCRIBED and SWORN before me  
By reliable electronic means (FaceTime  
and email) pursuant to Fed. R. Crim. P. 41(d)(3)  
on April 28, 2022

  
The Honorable John F. Docherty  
United States Magistrate Judge